

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA**

IN RE:)
) **Chapter 7**
Pro-Mark Services, Inc.)
) **Case No. 24-30167**
Debtor)
)

**MOTION FOR ADMISSION *PRO HAC VICE* OF JOSEPH E. LEHNERT AS
COUNSEL FOR PRUDENT FIDUCIARY SERVICES AND MIGUEL PAREDES**

Prudent Fiduciary Services (“PFS”) and Miguel Paredes (Paredes”) by and through their undersigned counsel and in compliance with Rule 9010-2B of the Local Rules of the Bankruptcy Court for the District of North Dakota (the “Local Rules”) hereby submit this Motion for Admission Pro Hac Vice of Joseph E. Lehnert as Counsel for Prudent Fiduciary Services and Miguel Paredes (the “Motion”), and in support thereof represents as follows:

1. PFS and Paredes have retained Keating Muething & Klekamp PLL (“KMK”) to represent them as their counsel of record in the above-referenced proceedings.
2. Mr. Lehnert is a partner at KMK, and is a member in good standing of the bar of the State of Ohio. A Certificate of Good Standing from the State Bar of Ohio is attached hereto as Exhibit A. Mr. Lehnert is currently admitted to practice in the following courts: Second Circuit Court of Appeals (2017); Sixth Circuit Court of Appeals (2016); and Southern District of Ohio (2013).
3. Mr. Lehnert has never been the subject of a disciplinary action by the bar or courts any state.
4. Mr. Lehnert is aware of and acknowledges that he is subject to all applicable provisions of the North Dakota Rules of Professional Conduct and the Local Rules, and if admitted *pro hac vice*, will adhere to the disciplinary jurisdiction of this Court.

5. Mr. Lehnert's contact information is as follows:

Joseph E. Lehnert
Keating Muething & Klekamp PLL
One East Fourth Street, Suite 1400
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Tel: (513) 639-3929
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6. Payment of the \$150.00 admission fee is being made with this filing through the Court's Pay.gov automated payment system.

WHEREFORE, PFS and Paredes respectfully request that this court enter an order authorizing the *pro hac vice* admission of Joseph E. Lehnert, to appear on their behalf in this court in the above-referenced proceedings, and for such other and further relief as may be just.

Respectfully submitted,

/s/ Joseph E. Lehnert
Joseph E. Lehnert
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*Attorney for Creditor,
Prudent Fiduciary Services and Miguel
Paredes*

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2024 a copy of the foregoing was served electronically through the Court's ECF System on all ECF participants registered in this case at the email address registered with the Court.

/s/ Joseph E. Lehnert

Joseph E. Lehnert

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